I am employed at FindLaw.com, the largest legal site on the web,where I produce
legal news and a technology law publication. I am also a
musician, a blogger and an attorney.

Over the past five years, I have self-released four albums, which contain
around 50 songs in total. To date, I have not played any live concerts. My
music is freely available on my website, which has received 1,200 visitors
over the past five months.

I have sent my CDs for airplay to many radio stations that broadcast in the
San Francisco area. For the most part, the radio stations I have targeted
are either "community" or college run stations. These stations do in fact
play music of other local artists.

Only one such station elected to play my music, and it was a show that
focused exclusively on unsigned, emerging musicians (The Next Big Thing,
KALX).

I was surprised that more college stations did not play my music. I do not
know the particular reasons why my CDs were rejected, but I assume it was
because: i) the music directors did not like my music; ii) the music
contained objectionable subject matter; and/or iii) my music did not fit
into the stations' format.

I believe that some of the stations in San Francisco are serving the needs
of the local music community. There are several shows on different stations
that highlight local talent. These shows allow you to send in demos for
possible inclusion. One thing I have noticed is that most if not all of
these local music shows focus exclusively on a single genre of music. So if
you're a musician that doesn't fit neatly into any such category, you have
no chance of getting any airplay.

Finally, I think there's too much of an emphasis put on live performance by
radio stations. The prevailing belief in radio is that a musician can only
establish a substantial following if s/he plays live. Increasingly, solo
musicians like myself are producing music without the assistance of band
members on their computers. In my case, there isn't a meaningful way to
perform this music in a live setting. As more an more people create music
alone on their personal computers, the live performance imperative must be
reconsidered.

"Local programming" should expansively include programming that is locally
produced and/or locally originated. In using both standards to measure local
programming, the Commission would: i) allow greater flexibility for stations
in meeting the local programming requirements; and ii) provide opportunities
for local producers to promote their work.

Local programming should be defined expansively to include all types of
locally focused programming. This could include local news, public affairs
discussion, as well as local sports and entertainment coverage.

In addition to the aforementioned local programming, I feel there should be
some narrow requirement on all radio stations to playing the music of local
artists.

Participation in local community activities should count toward a station's
localism requirement. However a station should not be able to fully satisfy

its requirement only by participating in community events. There should be some on-air component to a station's localism.

National playlists are convenient for station owners and record labels, but they do have a negative effect on local musicians.

This effect is readily apparent with hip hop stations. Many artists on these stations' national playlists rap about their hometown (e.g., Atlanta). A San Francisco rap group may find it impossible to get airplay on a San Francisco radio station, while a group from the "ATL" gets non-stop airtime simply because it is on a national playlist.

Stations should be required to play a certain percentage of local music. This requirement should also have a time component so that all the local music is not aired at 3:00am.

I thank the Commission for soliciting my comments, and I hope that they are helpful to your inquiry.